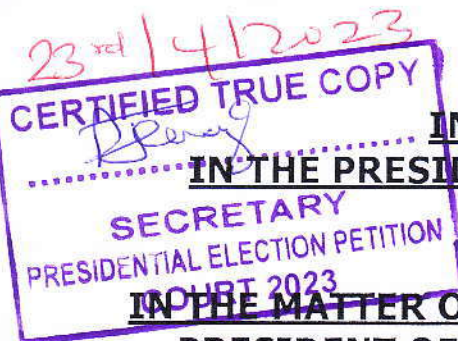


EXHIBIT E



IN THE COURT OF APPEAL

IN THE PRESIDENTIAL ELECTION PETITION COURT

HOLDEN AT ABUJA

IN THE MATTER OF THE ELECTION TO THE OFFICE OF THE
PRESIDENT OF THE FEDERAL REPUBLIC OF NIGERIA
HELD ON 25TH FEBRUARY 2023

J.J EKPEROBE Esq

PETITION NO: CA/PEPC/05/2023

BETWEEN:

1. ABUBAKAR ATIKU.....PETITIONERS
2. PEOPLES DEMOCRATIC PARTY (PDP)

AND:

1. INDEPENDENT NATIONAL ELECTORAL COMMISSION
(INEC)
2. TINUBU BOLA AHMED
3. ALL PROGRESSIVES CONGRESS (APC)RESPONDENTS

PETITIONERS' REPLY TO THE 2ND
RESPONDENT'S REPLY TO THE
PETITION



IN THE COURT OF APPEAL
IN THE PRESIDENTIAL ELECTION PETITION COURT
HOLDEN AT ABUJA

IN THE MATTER OF THE ELECTION TO THE OFFICE OF THE
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- 2. PEOPLES DEMOCRATIC PARTY (PDP)**

AND:

- 1. INDEPENDENT NATIONAL ELECTORAL COMMISSION
(INEC)**
- 2. TINUBU BOLA AHMED**
- 3. ALL PROGRESSIVES CONGRESS (APC).....RESPONDENTS**

PETITIONERS' REPLY TO THE 2ND
RESPONDENT'S REPLY

PART ONE:

REPLY TO THE PRELIMINARY OBJECTION

1. In reply to the 2nd Respondent's Preliminary Objection, the Petitioners state as follows:
- (i). The Petitioners will urge this Honourable Court to dismiss the Preliminary Objection as same is grossly misconceived and lacking in merit.

- (ii). Contrary to the 2nd Respondent's contention in paragraph I, the Petition does not constitute a gross abuse of the process of the court, or any abuse whatsoever.
- (iii). The parties in the said suit are not the same as the parties in the instant proceedings. The proceedings which were commenced by Originating Summons dated 28th February, 2023, filed by the Attorneys-General of Adamawa State, Akwa-Ibom State, Bayelsa State, Delta State Edo State and Sokoto State as Plaintiffs, had since been discontinued.
- (iv). The grounds of the Petition are competent as they comply with Section 134(1)(a), (b) and (c) of the Electoral Act, 2022. The election of the 2nd Respondent did not meet the applicable requirements enunciated in section 134(3) of the Electoral Act.
- (v). The Petition is properly constituted pursuant to section 133 of the Electoral Act, 2022 and paragraph 4(1) & (2) of the Rules of Procedure for Election Petition.
- (vi). The Petitioners' prayers are grantable pursuant to paragraph 4(3) of the Rules of procedure for Election Petition and section 136(1), (2) and (3) of the Electoral Act 2022.

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(vii). The 2nd Respondent did not meet the constitutional threshold and is constitutionally disabled from contesting for the office of President of Federal Republic of Nigeria in that:-

(a). The 2nd Respondent forfeited a sum of **\$460,000 (Four Hundred and Sixty United States U.S. Dollars)** as substituted by a **competent authority**, sequel to a compromise agreement and for narcotics related crime (proceeds of crime) in the United States District Court, Northern District of Illinois Eastern Division, Judge A. NORDBERG.

(b). The 2nd Respondent holds dual citizenship of Nigeria and Guinea, having voluntarily acquired the citizenship of the Republic of Guinea.

(c). The 2nd Respondent did not disclose, and suppressed these facts of constitutional disqualification in his Form EC9 submitted to the 1st Respondent.

(viii). The ground on non-qualification is competent, being a constitutional issue.

(ix). In answer to paragraph V of the Preliminary Objection, the Petitioners aver that the paragraphs of the Petition

set out therein by the 3rd Respondent are not in any way generic, vague, un-referable, non-specific, nebulous, inchoate, incompetent, imprecise, fraught with ambiguity and liable to be struck out by the court. The said paragraphs of the Petition stated clearly the facts of the Election Petition, the grounds on which the Petition is based and the reliefs sought by the Petitioners.

- (x). Further to the above, the 2nd Respondent has not requested for any further particulars in relation to the said paragraphs of the Petition, which confirms that he clearly understands the assertions therein.
2. The Petitioners state that the ground of constitutional disqualification is a post-election issue to be determined by the Election Petition Tribunal or Court.
 3. The Petitioners state that the grounds of the 2nd Respondent's preliminary objection will require proof by evidence and therefore are not threshold grounds of preliminary objection.
 4. The Petitioners state that the entirety of the 2nd Respondent's objection is frivolous, misconceived face-saving, vexatious, absolutely and completely unfounded.

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PART TWO

PETITIONERS' REPLY TO THE 2ND

RESPONDENT'S REPLY ON THE MERITS

In reply to the 2nd Respondent's Reply to the Petition, the Petitioners aver as follows:-

1. Contrary to paragraph 7 of the 2nd Respondent's Reply, the Petitioners did not file any Originating Summons at the Supreme Court seeking to nullify the presidential election.
2. In response to paragraph 8(iv) of the 2nd Respondent's Reply, the 1st Petitioner, unlike the 2nd Respondent, has consistently been contesting presidential elections, given the 1st Petitioner's drug-free record, and has never had controversy surrounding his age, circumstances of his birth, state of origin, gender, educational qualification, health status, working career, and citizenship, all issues bordering on constitutional qualification to contest for the office of the President of the Federal Republic of Nigeria.
3. In further reply to the said paragraph 8(iv) and 10 of the 2nd Respondent's Reply, the 2nd Respondent having deliberately put in issue the records and qualifications of the 1st Petitioner, especially as against the 2nd Respondent, the Petitioners state as follows:

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- (i). The 2nd Respondent has demonstrated inconsistency as to his actual date of birth, secondary schools he attended (Government College Ibadan); his State of origin, gender; actual name; certificates evidencing Universities attended (Chicago State University). The purported degree Certificate of the 2nd Respondent allegedly acquired at the Chicago State University did not belong to him but to a Female (F) described as "F" in the Certificate bearing the name Bola Tinubu.
 - (ii). The 2nd Respondent did not disclose to the 1st Respondent his voluntary acquisition of citizenship of Republic of Guinea with Guinean Passport No. D00001551, in addition to his Nigerian citizenship. The 2nd Respondent is hereby given notice to produce the original copies of his said two passports.
 - (iii). The 2nd Respondent has record of criminal forfeiture of the sum of **\$460,000.00** for a drug related offence before the United States District Judge, John A Nordberg in the 2nd Respondent's First Heritage Account No. 263226700, being proceeds of narcotics-trafficking in violation of 18 U.S.C 1956 and 1947 for an offence involving narcotics.
4. In further response to paragraph 8(iv) of the 2nd Respondent's Reply, the Petitioners state that contesting presidential elections multiple times is not peculiar to the 1st Petitioner, as

the 3rd Respondent's candidate in 2015 and 2019, Muhammed Buhari, had serially contested presidential elections four times before being returned by the 1st Respondent in 2015.

5. The Petitioners state that paragraphs 11, 12, 15, 16, 17, 18, 19, 20, 21 and 22 of the 2nd Respondent's Reply are completely extraneous and pedestrian, and alien to the subject-matter of this Petition.
6. In response to paragraph 23 of the 2nd Respondent's Reply, the Petitioners state that they do not have any grievance against Mr Peter Gregory Obi and Rabi'u Musa Kwankwaso or any other candidate because they were not returned as the winner of the election by the 1st Respondent.
7. Contrary to the contention of the 2nd Respondent in paragraph 24 of the Reply, the Petitioners state the declaration and return made by the 1st Respondent in the presidential election was not a true reflection of the votes scored.
8. Contrary to paragraph 27 of the 2nd Respondent's Reply, the Petitioners state that the Petition is not vague but is sufficiently particularized in compliance with the provisions of the 1999 Constitution and the Electoral Act 2022.
9. The Petitioners refute the contents of the Tables referred to by the 2nd Respondent in paragraphs 29, 30 and 31 of the 2nd Respondent's Reply, same not being a correct reflection of the

votes cast in the said election. In further reply thereto, the Petitioners rely on their Statisticians Report pleaded.

10. In reply to paragraphs 39 and 40 of the 2nd Respondent's Reply, the Petitioners state that the defence of non-control of the eco-system and of third-party network providers is an after-thought, and the 2nd Respondent is not competent to offer such gratuitous defence on behalf of the 1st Respondent.

11. In response to paragraphs 41, 42, 43, 44, 45, 46, and 47 of the 2nd Respondent's Reply, the Petitioners aver that the 1st Respondent persisted in the violation of its Regulations in that:-

(i). as at the time the 1st Respondent commenced uploading of results to the IReV, the Presiding Officers were no longer at their polling units.

(ii) As at **18th March, 2023**, only results from **166,551** polling units out of **176,846** polling units across the country, had been uploaded on the IReV, as shown in the extract of the Data Report from the IReV.

12. Further to the above paragraph, the Petitioners state that the place, time and circumstances of these uploads remain unknown to the petitioners as none of the petitioner's agents were physically present to monitor the transmission of the purported results. The petitioners hereby plead and shall rely

in respect of the Presidential election results, on the webshots
from IReV portal:

Abia:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=1>;

Adamawa:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=2>

Akwa Ibom

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=3>

Anambra:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=4>

Bauchi:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=5>

Bayelsa:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=6>

Benue:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=7>

Borno:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=8>

Cross River:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=9>

Delta:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=10>

Ebonyi:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=11>

Edo:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=12>

Ekiti:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=13>

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Enugu:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=14>

FCT:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=15>

Gombe:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=16>

Imo:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=17>

Jigawa:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=18>

Kaduna:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=19>

Kano:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=20>

Kastina:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=21>

Kebbi:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=22>

Kogi:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=23>

Kwara:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=24>

Lagos:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=25>

Nasarawa:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=26>

Niger:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=27>

Ogun:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=28>

Ondo:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=29>

Osun:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=30>

Oyo:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=31>

Plateau:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=32>

Rivers:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=33>

Sokoto:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=34>

Taraba:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=35>

Yobe:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=36>

Zamfara:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=37>

13. In further response to paragraphs 46 and 47 of the 2nd Respondent's Reply to the Petition, the Petitioners aver that the 1st Respondent in the conduct of the election introduced the technological device, (BVAS) the use of which was made mandatory under the new electoral management regime to guarantee transparency in both accreditation and transmission of results.

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14. Contrary to paragraphs 48 and 49 of the 2nd Respondent's Reply, the Petitioners state that at every opportunity, their agents at different collation stations, protested the refusal to upload results and the correctness of results being declared by the 1st Respondent, including at the National Collation Centre, International Conference Centre, Abuja, which culminated in a walk-out protest.
15. Contrary to paragraph 55 of the 2nd Respondent's Reply, the Petitioners state that the use of technological device (BVAS) is mandatory in both accreditation and transmission of results to the IReV before any declaration is made in an election, pursuant to Sections 47(2) and (3) 60(5) and 64(4), of the Electoral Act, 2022 and Paragraph 38(1) and (2) of the Regulations and Guidelines issued by the 1st Respondent.
16. In answer to paragraphs 65 and 66 of the 2nd Respondent's Reply, the Petitioners state that the refusal or failure by the 1st Respondent to transmit the results of the presidential election was deliberate, and not as claimed by the 2nd Respondent "that the configurations of the devices of both elections were totally different". There was deliberate interference with the transmission protocols, including refusal by the 1st Respondent to release access to the Presiding Officers at the polling units nationwide.

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17. In response to paragraphs 72, 73, 74, 75, 76, and 77 of the 2nd Respondent's Reply, the Petitioners state that the Federal Capital Territory, Abuja enjoys a special constitutional status, by virtue of its creation and the constitutional provisions. A candidate to be declared the winner of a presidential election must therefore have not less than one quarter of the votes cast at the election in the Federal Capital Territory, Abuja. The Petitioners shall place reliance on the Report of the "Special Committee on the Setting Up of the Federal Capital Territory" and all documents related thereto.
18. In response to paragraphs 83 and 121 of the 2nd Respondent's Reply, the Petitioners state that the 2nd Respondent did not suffer any shortfall of 10,929 votes in Kano State or at all. Contrary to the averments of the 2nd Respondent in paragraph 85 of the 2nd Respondent's Reply, the Petitioners disclosed the several States where massive voters' suppression took place.
19. In reaction to paragraph 122 of the 2nd Respondent's Reply, the Petitioners while admitting that the 2nd Respondent may be a "titan and a maestro," but certainly not in national stature, but titan-ship and maestro-ship in controversies such as age, State of origin, identity, educational qualifications represented by certificates obtained from Universities and Colleges, forfeiture in drug-related offences, and failure to disclose dual nationality to the 1st Respondent, amongst others. The comparison of the 2nd Respondent with the 1st Petitioner, who had attained the eminent position of Vice

President of the Federal Republic of Nigeria for eight (8) years, is totally unfounded.

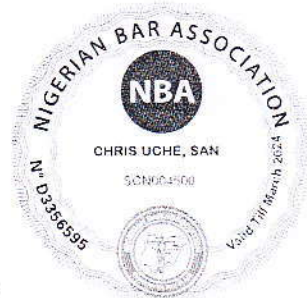
20. The Petitioners refute the contents of the Table in paragraph 123 of the 2nd Respondent's Reply, the 2nd Respondent not having secured 25% of the votes cast in the Federal Capital Territory, Abuja as constitutionally required.
21. The Petitioners deny the votes set out in paragraphs 126 and 127 of the 2nd Respondent's Reply and the accompanying Table 5.
22. In response to paragraph 125, 128 and 129 of the 2nd Respondent's Reply, the Petitioners state that there are no irregularities in the polling units.
23. In answer to the 2nd Respondent's Notice of Objection to Votes, the Petitioners state that contrary to the contents of the Appendix A referenced in paragraphs 124 and 128 of the 2nd Respondent's Reply, the results in the specified polling units in Adamawa State, Federal Capital Territory, Abuja and Taraba State are valid results and represent the correct outcome of the election therein. The Petitioners shall rely on the evidence of their agents in the said polling units.
24. In reaction to paragraphs 131 and 132 of the 2nd Respondent's Reply, the Petitioners state that the 2nd Respondent did not meet the constitutional requirement as to qualification and the

2nd Respondent's return as the winner of the election is undue, unlawful and invalid.

25. The Petitioners aver that the 2nd Respondent's Reply does not answer the points of substance in the Petition, but is full of extraneous facts, contradictory, evasive, speculative and vague assertions.
26. **WHEREFORE** the Petitioners pray the Honourable Court to discountenance the objections and the averments contained in the 2nd Respondent's Reply to the Petition, and grant the reliefs sought in the Petition.

DATED THIS 22ND DAY OF APRIL, 2023.

**Chief Chris Uche, SAN✓
Paul Usoro, SAN,
Eyitayo Jegede, SAN,
Prof. Mike Ozekhome, SAN,
Nella Andem-Rabana, SAN
Ken Mozia, SAN,
Dr. Garba Tetengi, SAN,
Joe Abrahams, SAN,
Mahmud Magaji, SAN,
Chukwuma-Machukwu Ume, SAN,
Prof. Maxwell Gidado, SAN,
Emeka Etiaba, SAN,
Gordy Uche, SAN,
Edward Ashiekaa, SAN,
A.K. Ajibade, SAN,
Abdul Ibrahim, SAN,
Paul Harris Ogbale, SAN,
Olusegun Jolaawo, SAN,**



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O. M. Atoyebi, SAN,
Nurueni Jimoh, SAN,
Kemasuode Wodu, SAN,
Yakubu Maikasuwa, SAN,
Andrew Malgwi, SAN,
Ifeanyi Iboko Esq.,
Prof. Yusuf Dankofa,
M.S. Atolagbe Esq.,
O. A. Dada Esq.,
Ahmed T. Uwais Esq.,
Abdulazeez Ibrahim Esq.,
Olabode Makinde Esq.,
Silas Joseph Onu Esq.,
Adedamola Fanokun Esq.,
Kanayo Okafor, Esq.
Jude A. Daniel Esq.,
Francis O. Oronsaye, Esq.
Udzahu Medugu, Esq.
Okueyelegbe S. Maliki Esq.,
Ime Edem-Nse, Esq.
Queen Ubokutom I. Umana Esq.,
Princess N. Dimkpa Esq.,
Genevieve A. Okereke, Esq.
Jerry Ombugadu Musa, Esq.
Chukwudi Maduka, Esq.
Olakunle Lawal, Esq.
Abduljalil Musa, Esq.
Jacob O. Otokpa Esq.,
Chinasa Amechi, Esq.
Affis Matanmi, Esq.
Abdulkaber Badmos, Esq.
Francis Nsiegbunam, Esq.
Osilama Mike Ozekhome, Esq.
Chris Mike Uche, Esq.
John Odeh, Esq.
Oshomha Mike Ozekhome, Esq.
David Nwokike Esq.,
Caleb Yakubu Esq.,
Agbodike Maureen Chikodo, Esq.

Hajara Sorondiki, Esq.

James Omotosho, Esq.

Joshua H. Barka

PETITIONERS' COUNSEL,
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Angels Court,
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N.I.N. of Signatory – 13063727966

Tel: +234-807-853-777; +234-803-321-7659;

pdplegalteam@gmail.com

FOR SERVICE ON:

1st Respondent:

C/o Its Counsel,
A. B. Mahmoud, OON, SAN, FCI Arb,
Dikko & Mahmoud
No. 10 Seguela Street,
Wuse 11, Abuja.
08035159424.

2nd Respondent:

C/o His Counsel,
Chief Wole Olanipekun, CFR, SAN, FCI Arb,
Wole Olanipekun & Co.
God's Grace House,
No. 6 Oshakati Close,
Off Constantine Street,
Wuse Zone 4,
Abuja.
0806262779; 08060749219

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3rd Respondent:

C/o Its Counsel,
Prince Lateef Fagbemi, SAN, FCI Arb (UK),
Lateef O. Fagbemi & Co.
2nd Floor,
Rivers State Office Complex,
Opp. Federal Ministry of Finance,
Central Area,
Abuja.
08033246788; 080615324

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IN THE COURT OF APPEAL
IN THE PRESIDENTIAL ELECTION PETITION COURT
HOLDEN AT ABUJA

IN THE MATTER OF THE ELECTION TO THE OFFICE OF THE
PRESIDENT OF THE FEDERAL REPUBLIC OF NIGERIA
HELD ON 25TH FEBRUARY 2023

PETITION NO: CA/PEPC/05/2023

BETWEEN:

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2. PEOPLES DEMOCRATIC PARTY (PDP)

} **PETITIONERS**

AND

**1. INDEPENDENT NATIONAL ELECTORAL
COMMISSION (INEC)**

2. TINUBU BOLA AHMED

3. ALL PROGRESSIVES CONGRESS (APC)

} **RESPONDENTS**

WITNESS STATEMENT ON OATH OF PDPC IN THE PETITIONERS'
REPLY TO THE 2ND RESPONDENT'S REPLY

I, **PDPC**, Nigerian citizen, Adult, Male, of the Peoples Democratic Party Headquarters, Wadata Plaza, Wuse Zone 5, Abuja, do hereby make oath and state as follows:

1. That I am a member of the Peoples Democratic Party, the 2nd Petitioner in this Petition.
2. That I acted as one of the National Coordinators for the Petitioners at the Presidential Election held on 25th February, 2023.

3. That by virtue of my position I am very conversant with the facts deposed to herein, being facts known personally to me, related to me by my subordinates in the course of my carrying out my assignment or gleaned in the course of meetings with the legal team of the petitioners and through perusal of relevant documents in the said meetings.
4. That my responsibilities as one of the National Collation Agents of the Petitioners included receiving all electoral results and reports from my subordinates, as well as scrutinizing and analysing electoral results and documents used in, and relevant to the election.
5. That the facts deposed to herein are with the consent of the Petitioners and derived from my personal knowledge except where I have otherwise stated the source of my information and belief.
6. That I had earlier deposed to a witness statement on oath in support of the Petition on the 21st day of March, 2023.
7. That the instant statement is with respect to the Petitioners' Reply to the 2nd Respondent's Reply to the Petition.
8. That I have seen, read and I understand the 2nd Respondent's Reply to the Petition, the Witness Statements on Oath attached thereto and the documents frontload therewith.
9. That I know that contrary to the 2nd Respondent's contention in paragraph I, the Petition does not constitute a gross abuse of the

process of the court, or any abuse whatsoever.

10. That the parties in the said suit are not the same as the parties in the instant proceedings. The proceedings that were commenced by Originating Summons dated 28th February, 2023, filed by the Attorneys-General of Adamawa State, Akwa-Ibom State, Bayelsa State, Delta State Edo State and Sokoto State as Plaintiffs, has since been discontinued.
11. That the grounds of the Petition are competent as they comply with Section 134(1)(a), (b) and (c) of the Electoral Act, 2022. The election of the 2nd Respondent did not meet the applicable requirements enunciated in section 134(3) of the Electoral Act.
12. That the Petition is properly constituted pursuant to section 133 of the Electoral Act, 2022 and paragraph 4(1) & (2) of the Rules of Procedure for Election Petition.
13. The Petitioners' prayers are grantable pursuant to paragraph 4(3) of the Rules of procedure for Election Petition and section 136(1), (2) and (3) of the Electoral Act 2022.
14. That I have been informed by the Petitioners' legal team in a meeting at the 2nd Petitioners' Headquarters on the 22nd April, 2023 at about 4pm and I verily believe to be true that the 2nd Respondent did not meet the constitutional threshold and is constitutionally disabled from contesting for the office of President of Federal Republic of Nigeria in that:-

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- a) The 2nd Respondent forfeited a sum of **\$460,000 (Four Hundred and Sixty United States U.S. Dollars)** as substituted by a **competent authority**, sequel to a compromise agreement and for narcotics related crime (proceeds of crime) in the United States District Court, Northern District of Illinois Eastern Division, Judge A. NORDBERG presiding.
- b) The 2nd Respondent holds dual citizenship of Nigeria and Guinea, having voluntarily acquired the citizenship of the Republic of Guinea.
- c) The 2nd Respondent did not disclose, and suppressed these facts of constitutional disqualification in his Form EC9 submitted to the 1st Respondent.
- d) The ground on non-qualification is competent, being a constitutional issue.
- e) The Paragraphs of the Petition set out in the 3rd Respondent's Preliminary Objection are not in any way generic, vague, un-referable, non-specific, nebulous, inchoate, incompetent, imprecise, fraught with ambiguity and thus not liable to be struck out by the Court.
- f) The said paragraphs of the Petition stated clearly the facts of the Election Petition, the grounds on which the Petition is based and the reliefs sought by the Petitioners.

- g) Further to the above, the 2nd Respondent has not requested for any further particulars in relation to the said paragraphs of the petition, which confirms that he clearly understands the assertions therein.
 - h) The ground of constitutional disqualification is a post-election issue to be determined by the Election Petition Tribunal or Court. The grounds of the 2nd Respondent's preliminary objection will require proof by evidence and therefore are not threshold grounds of preliminary objection.
15. That the entirety of the 2nd Respondent's objection is frivolous, misconceived face-saving, vexatious, absolutely and completely unfounded.
16. That contrary to paragraph 7 of the 2nd Respondent's Reply, the Petitioners did not file any Originating Summons at the Supreme Court seeking to nullify the presidential election.
17. That the 1st Petitioner, unlike the 2nd Respondent, has consistently been contesting presidential elections, given the 1st Petitioner's drug-free record, and has never had controversy surrounding his age, circumstances of his birth, state of origin, gender, educational qualification, health status, working career, and citizenship, all issues bordering on constitutional qualification to contest for the office of the President of the Federal Republic of Nigeria. 🍌
18. That further to paragraph 19 above, the 2nd Respondent having deliberately put in issue the records and qualifications of the 1st

Petitioner, especially as against the 2nd Respondent, I know as a fact that:

- i) The 2nd Respondent has demonstrated inconsistency as to his actual date of birth, secondary schools he attended (Government College Ibadan); his State of origin, gender; actual name; certificates evidencing Universities attended (Chicago State University). The purported degree Certificate of the 2nd Respondent allegedly acquired at the Chicago State University did not belong to him but to a Female (F) described as "F" in the Certificate bearing the name Bola Tinubu.
 - ii) The 2nd Respondent did not disclose his voluntary acquisition of citizenship of Republic of Guinea with Guinean Passport No. D00001551, in addition to his Nigerian citizenship. The 2nd Respondent is hereby given notice to produce the original copies of his said two passports.
 - iii) The 2nd Respondent has record of criminal forfeiture of the sum of **\$460,000.00** for a drug related offence before the United States District Judge, John A Nordberg in the 2nd Respondent's First Heritage Account No. 263226700, being proceeds of narcotics-trafficking in violation of 18 U.S.C 1956 and 1947 for an offence involving narcotics.
19. That I also know as a fact that contesting presidential elections multiple times is not offensive or peculiar to the 1st Petitioner, as the 3rd Respondent's candidate in 2015 and 2019, Muhammed

Buhari, had serially contested presidential elections four times before being returned by the 1st Respondent in 2015.

20. That paragraphs 11, 12, 15, 16, 17, 18, 19, 20, 21 and 22 of the 2nd Respondent's Reply are completely extraneous, pedestrian, and alien to the subject-matter of this Petition.
21. That in response to paragraph 23 of the 2nd Respondent's Reply, I know that the Petitioners do not have any grievance against Mr Peter Gregory Obi and Rabi'u Musa Kwankwaso or any other candidate because they were not returned as the winner of the election by the 1st Respondent.
22. That contrary to the contention of the 2nd Respondent in paragraph 24 of the Reply, I know that the declaration and return made by the 1st Respondent in the presidential election was not a true reflection of the votes scored.
23. That contrary to paragraph 27 of the 2nd Respondent's Reply, the Petition is not vague, but is sufficiently particularized in compliance with the provisions of the 1999 Constitution and the Electoral Act 2022.
24. That the contents of the Tables referred to by the 2nd Respondent in paragraphs 29, 30 and 31 of the 2nd Respondent's Reply, are not a correct reflection of the votes cast in the said election.
25. That in reply to paragraphs 39 and 40 of the 2nd Respondent's Reply, I state that the defence of non-control eco-system and of

third-party network providers is an after-thought, and the 2nd Respondent is not competent to offer such gratuitous defence on behalf of the 1st Respondent.

26. That in response to paragraphs 41, 42, 43, 44, 45, 46, and 47 of the 2nd Respondent's Reply, I know as a fact that the 1st Respondent persisted in the violation of its Regulations in that:-

(i). as at the time the 1st Respondent commenced uploading of results to the IReV, the Presiding Officers were no longer at their polling units.

(ii) As at **18th March, 2023**, only results from **166,551** polling units out of **176,846** polling units across the country, had been uploaded on the IReV, as shown in the extract of the Data Report from the IReV.

27. That the place, time and circumstances of these uploads remain unknown to the Petitioners as none of the Petitioner's agents were physically present to monitor the transmission of the purported results. We shall rely on the webshots from IREV portal for the presidential election:

Abia:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=1>;

Adamawa:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=2>

Akwa Ibom

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=3>

Anambra:

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<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=4>
Bauchi:
<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=5>
Bayelsa:
<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=6>
Benue:
<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=7>
Borno:
<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=8>
Cross River:
<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=9>
Delta:
<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=10>
Ebonyi:
<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=11>
Edo:
<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=12>
Ekiti:
<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=13>
Enugu:
<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=14>
FCT:
<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=15>
Gombe:
<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=16>
Imo:
<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=17>
Jigawa:

CERTIFIED TRUE COPY

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=18>
Kaduna:
<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=19>
Kano:
<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=20>
Kastina:
<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=21>
Kebbi:
<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=22>
Kogi:
<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=23>
Kwara:
<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=24>
Lagos:
<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=25>
Nasarawa:
<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=26>
Niger:
<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=27>
Ogun:
<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=28>
Ondo:
<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=29>
Osun:
<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=30>
Oyo:
<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=31>
Plateau:

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<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=32>

Rivers:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=33>

Sokoto:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=34>

Taraba:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=35>

Yobe:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=36>

Zamfara:

<https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=37>

28. That in further response to paragraphs 46 and 47 of the 2nd Respondent's Reply to the Petition, I state that the 1st Respondent in the conduct of the election introduced the technological device, (BVAS) the use of which was made mandatory under the new electoral management regime to guarantee transparency in both accreditation and transmission of results.
29. That contrary to paragraphs 48 and 49 of the 2nd Respondent's Reply, at every opportunity, the Petitioners agents at different collation stations protested the refusal to upload results and the correctness of results being declared by the 1st Respondent, including at the National Collation Centre, International Conference Centre, Abuja, which culminated in a walk-out protest.
30. That contrary to paragraph 55 of the 2nd Respondent's Reply, I know and state that the use of technological device (BVAS) is

mandatory in both accreditation and transmission of results to the IReV before any declaration is made in an election, pursuant to Sections 47(2) and (3) 60(5) and 64(4), of the Electoral Act, 2022 and Paragraph 38(1) and (2) of the Regulations and Guidelines issued by the 1st Respondent.

31. That in answer to paragraphs 65 and 66 of the 2nd Respondent's Reply, I know as a fact that the refusal or failure by the 1st Respondent to transmit the results of the presidential election was deliberate, and not as claimed by the 2nd Respondent "that the configurations of the devices of both elections were totally different". There was deliberate interference with the transmission protocols, including refusal by the 1st Respondent to release access to the Presiding Officers at the polling units nationwide.
32. That in response to paragraphs 72, 73, 74, 75, 76, and 77 of the 2nd Respondent's Reply, I know that the Federal Capital Territory, Abuja enjoys a special constitutional status, by virtue of its creation and the constitutional provisions.
33. That I know that a candidate to be declared the winner of a presidential election must therefore have not less than one quarter of the votes cast at the election in the Federal Capital Territory, Abuja. The Petitioners shall place reliance on the Report of the *"Special Committee on the Setting Up of the Federal Capital Territory"* and all documents related thereto.

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34. That in response to paragraphs 83 and 121 of the 2nd Respondent's Reply, I know as a fact that the 2nd Respondent did not suffer any shortfall of 10,929 votes in Kano State or at all.
35. That contrary to the averments of the 2nd Respondent in paragraph 85 of the 2nd Respondent's Reply, the Petitioners disclosed the several States where massive voters' suppression took place.
36. That in reaction to paragraph 122 of the 2nd Respondent's Reply, I know as a fact that the 2nd Respondent has been embroiled in several controversies of international magnitude with respect to his age, State of origin, identity, educational qualifications represented by certificates obtained from Universities and Colleges, forfeiture in drug-related offences, and failure to disclose dual nationality to the 1st Respondent. The comparison of the 2nd Respondent with the 1st Petitioner, who had attained the eminent position of Vice President of the Federal Republic of Nigeria for eight (8) years, is unfounded.
37. That the contents of the Table in paragraph 123 of the 2nd Respondent's Reply, are false, the 2nd Respondent not having secured 25% of the votes cast in the Federal Capital Territory, Abuja as constitutionally required.
38. That the votes set out in paragraphs 126 and 127 of the 2nd Respondent's Reply and the accompanying Table 5 are false and contrived.

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39. That in response to paragraph 125, 128 and 129 of the 2nd Respondent's Reply, I know that there are no irregularities in the polling units stated therein.
40. That in answer to the 2nd Respondent's Notice of Objection to Votes, I know as a fact that contrary to the contents of the Appendix A referenced in paragraphs 124 and 128 of the 2nd Respondent's Reply, the results in the specified polling units in Adamawa State, Federal Capital Territory, Abuja and Taraba State are valid results and represent the correct outcome of the election therein.
41. That in reply to paragraphs 131 and 132 of the 2nd Respondent's Reply, I know as a fact that the 2nd Respondent did not meet the constitutional requirement as to qualification and the 2nd Respondent's return as the winner of the election is undue, unlawful and invalid.
42. That I know that the 2nd Respondent's Reply does not answer the points of substance in the Petition, but is full of extraneous facts, contradictory, evasive, speculative and vague assertions.
43. That I know that the interest of justice will be served by the Honourable Court discountenancing the objections and the averments contained in the 2nd Respondent's Reply to the Petition and granting the reliefs sought in the Petition.

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44. That I swear to this Witness Statement on Oath conscientiously believing the contents to be true, correct and in accordance with the Oaths Act, LFN 2004.

P D P C
DEPONENT

SWORN TO at the
Presidential Election Petition Court
Court of Appeal Registry,
Abuja

Dated this 23rd day of April 2023

BEFORE ME

[Signature]



COMMISSIONER FOR OATHS

CERTIFIED TRUE COPY

IN THE COURT OF APPEAL
IN THE PRESIDENTIAL ELECTION PETITION COURT
HOLDEN AT ABUJA

IN THE MATTER OF THE ELECTION TO THE OFFICE OF THE
PRESIDENT OF THE FEDERAL REPUBLIC OF NIGERIA
HELD ON 25TH FEBRUARY 2023

PETITION NO: CA/PEPC/05/2023

BETWEEN:

- 1. ABUBAKAR ATIKU.....PETITIONERS**
- 2. PEOPLES DEMOCRATIC PARTY (PDP)**

AND:

- 1. INDEPENDENT NATIONAL ELECTORAL COMMISSION (INEC)**
- 2. TINUBU BOLA AHMED**
- 3. ALL PROGRESSIVES CONGRESS (APC).....RESPONDENTS**

WITNESS STATEMENT ON OATH OF DM IN THE
PETITIONERS' REPLY TO THE 2ND RESPONDENT'S REPLY

I, **DM**, Male, Nigerian Citizen and a Politician of Wadata House, Plot 1975, Michael Okpara Street, Abuja, FCT, make this Oath and state as follows;

1. That I am a member of the 2nd Petitioner and the Constituency Collation Agent of the Petitioners in the Presidential Election held on 25/2/2023 and by virtue of this fact, I am conversant with the facts deposed herein.

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2. That I had earlier deposed to a Statement on Oath in support of this Petition.
3. That As the Constituency Collation Agent of the Petitioners, I know that copies of the Polling Units results were given to our Agents at the Polling Units and they handed same over to the Ward Collation Agents who passed same over to the Local Government Collection Agents and from them to the State Collation Agents who eventually handed all the results as in Forms EC8A, EC8B, EC8C, EC8D to me.
4. That I have had time to look at the Polling Units results cited for irregularities in Adamawa State, Taraba state and Federal Capital Territory, Abuja and I know that there were no irregularities in the identified polling units.
5. That I have seen 2nd Respondent's Appendix A which is a representation of the alleged irregularities, Polling Unit by Polling Unit and I know that the contents of the tables therein are false.
6. That I have gone through the 2nd Respondent's Reply to the Petition together with the Witnesses Statements on Oath and I state that there were valid accreditation and voting in the polling units in all the areas complained about by the 2nd Respondent.
7. That the Petitioners' votes in the areas where 2nd Respondent challenged are earned.
8. That I make this Witness Statement in good faith, believing same to be true and in accordance with the Oaths Act.

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DM

Deponent

Sworn to at The Registry
Of The Court of Appeal, Abuja,
Nigeria.

This 23rd day Of April, 2023.

Before Me

Deputy

SECRETARY
PRESIDENTIAL ELECTION
PETITION COURT
2023

Commissioner For Oaths

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IN THE COURT OF APPEAL
IN THE PRESIDENTIAL ELECTION PETITION COURT
HOLDEN AT ABUJA

IN THE MATTER OF THE ELECTION TO THE OFFICE OF THE
PRESIDENT OF THE FEDERAL REPUBLIC OF NIGERIA
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BETWEEN:

- 1. ABUBAKAR ATIKU.....PETITIONERS**
- 2. PEOPLES DEMOCRATIC PARTY (PDP)**


AND:

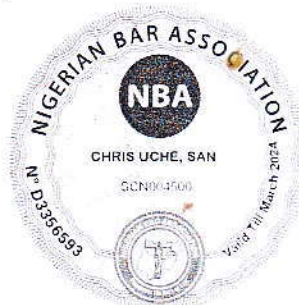
- 1. INDEPENDENT NATIONAL ELECTORAL COMMISSION (INEC)**
- 2. TINUBU BOLA AHMED**
- 3. ALL PROGRESSIVES CONGRESS (APC).....RESPONDENTS**

PETITIONERS' LIST OF ADDITIONAL
WITNESSES

- 1. PDPC**
- 2. DM**
- 3. Subpoenaed Witness(es)**
- 4. Any other Witness(es) as may be called by the leave of this Honourable Court**

DATED THIS 22ND DAY OF APRIL, 2023.


Chief Chris Uche, SAN✓
Paul Usoro, SAN,
Eyitayo Jegede, SAN,



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**Prof. Mike Ozekhome, SAN,
Nella Andem-Rabana, SAN
Ken Mozia, SAN,
Dr. Garba Tetengi, SAN,
Joe Abrahams, SAN,
Mahmud Magaji, SAN,
Chukwuma-Machukwu Ume, SAN,
Prof. Maxwell Gidado, SAN,
Emeka Etiaba, SAN,
Gordy Uche, SAN,
Edward Ashiekaa, SAN,
A.K. Ajibade, SAN,
Abdul Ibrahim, SAN,
Paul Harris Ogbole, SAN,
Olusegun Jolaawo, SAN,
O. M. Atoyebi, SAN,
Nurueni Jimoh, SAN,
Kemasuode Wodu, SAN,
Yakubu Maikasuwa, SAN,
Andrew Malgwi, SAN,
Ifeanyi Iboko Esq.,
Prof. Yusuf Dankofa,
M.S. Atolagbe Esq.,
O. A. Dada Esq.,
Ahmed T. Uwais Esq.,
Abdulazeez Ibrahim Esq.,
Olabode Makinde Esq.,
Silas Joseph Onu Esq.,
Adedamola Fanokun Esq.,
Kanayo Okafor, Esq.
Jude A. Daniel Esq.,
Francis O. Oronsaye, Esq.
Udzahu Medugu, Esq.
Okueyelegbe S. Maliki Esq.,
Ime Edem-Nse, Esq.
Queen Ubokutom I. Umana Esq.,
Princess N. Dimkpa Esq.,
Genevieve A. Okereke, Esq.
Jerry Ombugadu Musa, Esq.**

Chukwudi Maduka, Esq.
Olakunle Lawal, Esq.
Abduljalil Musa, Esq.
Jacob O. Otokpa Esq.,
Chinasa Amechi, Esq.
Affis Matanmi, Esq.
Abdulkaber Badmos, Esq.
Francis Nsiegbunam, Esq.
Osilama Mike Ozekhome, Esq.
Chris Mike Uche, Esq.
John Odeh, Esq.
Oshomha Mike Ozekhome, Esq.
David Nwokike Esq.,
Caleb Yakubu Esq.,
Agbodike Maureen Chikodo, Esq.
Hajara Sorondiki, Esq.
James Omotosho, Esq.
Joshua H. Barka

PETITIONERS' COUNSEL,
c/o Chief Chris Uche (SAN) & Co,
Angels Court,
34 Kumasi Crescent,
Wuse 2,
Abuja.

uchesan@nigerianbar.ng

N.I.N. of Signatory – 13063727966

Tel: +234-807-853-777; +234-803-321-7659;

pdplegalteam@gmail.com

FOR SERVICE ON:

1st Respondent:

C/o Its Counsel,
A. B. Mahmoud, OON, SAN, FCIArb,
Dikko & Mahmoud
No. 10 Seguela Street,
Wuse 11, Abuja.
08035159424.

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2nd Respondent:

C/o His Counsel,
Chief Wole Olanipekun, CFR, SAN, FCI Arb,
Wole Olanipekun & Co.
God's Grace House,
No. 6 Oshakati Close,
Off Constantine Street,
Wuse Zone 4,
Abuja.
0806262779; 08060749219

3rd Respondent:

C/o Its Counsel,
Prince Lateef Fagbemi, SAN, FCI Arb (UK),
Lateef O. Fagbemi & Co.
2nd Floor,
Rivers State Office Complex,
Opp. Federal Ministry of Finance,
Central Area,
Abuja.
08033246788; 080615324

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IN THE COURT OF APPEAL
IN THE PRESIDENTIAL ELECTION PETITION COURT
HOLDEN AT ABUJA

IN THE MATTER OF THE ELECTION TO THE OFFICE OF THE
PRESIDENT OF THE FEDERAL REPUBLIC OF NIGERIA
HELD ON 25TH FEBRUARY 2023

PETITION NO: CA/PEPC/05/2023

BETWEEN:

- 1. ABUBAKAR ATIKU.....PETITIONERS**
- 2. PEOPLES DEMOCRATIC PARTY (PDP)**

AND:

- 1. INDEPENDENT NATIONAL ELECTORAL COMMISSION
(INEC)**
- 2. TINUBU BOLA AHMED**
- 3. ALL PROGRESSIVES CONGRESS (APC).....RESPONDENTS**

PETITIONERS' LIST OF ADDITIONAL
DOCUMENTS

1. 2nd Respondent's Form EC9 submitted by the 3rd Respondent to the 1st Respondent in respect of the 2023 Presidential Election
2. Affidavit in Respect of Lost Certificate and INEC Form EC 001 executed by the 2nd Respondent in respect of the 1999 Lagos State Governorship Election
3. 2nd Respondent's Guinean International Passport with Passport No.: D00001551
4. Decision (Verdict) of United State of America District Judge, John A. Nordberg in relation to the trial of the 2nd Respondent for involvement in narcotic activities.

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5. Webshots of IreV for the 36 States of the Federation and the Federal Capital Territory, Abuja, with various timestamps as captured on 19th March, 2023 via the links detailed below:
- a) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=1> (Abia State)
 - b) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=2> (Adamawa State)
 - c) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=3> (Akwa Ibom State)
 - d) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=4> (Anambra State)
 - e) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=5> (Bauchi State)
 - f) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=6> (Bayelsa State)
 - g) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=7> (Benue State)
 - h) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=8> (Borno State)
 - i) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=9> (Cross River State)
 - j) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=10> (Delta State)
 - k) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=11> (Ebonyi State)
 - l) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=12> (Edo State)
 - m) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=13> (Ekiti State)
 - n) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=14> (Enugu State)
 - o) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=15> (Federal Capital Territory, Abuja)
 - p) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=16> (Gombe State)
 - q) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=17> (Imo State)
 - r) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=18> (Jigawa State)

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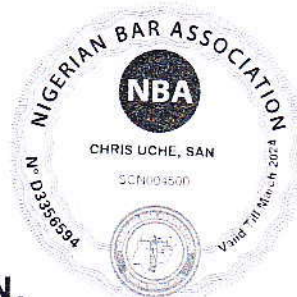
- s) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=19> (Kaduna State)
- t) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=20> (Kano State)
- u) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=21> (Kastina State)
- v) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=22> (Kebbi State)
- w) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=23> (Kogi State)
- x) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=24> (Kwara State)
- y) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=25> (Lagos State)
- z) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=26> (Nasarawa State)
- aa) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=27> (Niger State)
- bb) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=28> (Ogun State)
- cc) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=29> (Ondo State)
- dd) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=30> (Osun State)
- ee) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=31> (Oyo State)
- ff) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=32> (Plateau State)
- gg) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=33> (Rivers State)
- hh) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=34> (Sokoto State)
- ii) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=35> (Taraba State)
- jj) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=36> (Yobe State)
- kk) <https://www.inecelectionresults.ng/elections/63f8f25b594e164f8146a213?state=37> (Zamfara State)

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6. Notice of Discontinuance dated and filed 3rd March, 2023 with respect to Supreme Court Suit No.: SC/CV/354/2023.
7. Any other documents relevant to facts pleaded.

DATED THIS 22ND DAY OF APRIL, 2023.

**Chief Chris Uche, SAN✓
Paul Usoro, SAN,
Eyitayo Jegede, SAN,
Prof. Mike Ozekhome, SAN,
Nella Andem-Rabana, SAN
Ken Mozia, SAN,
Dr. Garba Tetengi, SAN,
Joe Abrahams, SAN,
Mahmud Magaji, SAN,
Chukwuma-Machukwu Ume, SAN,
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Gordy Uche, SAN,
Edward Ashiekaa, SAN,
A.K. Ajibade, SAN,
Abdul Ibrahim, SAN,
Paul Harris Ogbole, SAN,
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O. M. Atoyebi, SAN,
Nurueni Jimoh, SAN,
Kemasuode Wodu, SAN,
Yakubu Maikasuwa, SAN,
Andrew Malgwi, SAN,
Ifeanyi Iboko Esq.,
Prof. Yusuf Dankofa,
M.S. Atolagbe Esq.,
O. A. Dada Esq.,
Ahmed T. Uwais Esq.,
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